

## Exhibit “E”

### Declaration of Robert Holmes

1 Krieg, Keller, Sloan, Reilley & Roman LLP  
114 Sansome Street, Suite 400  
2 San Francisco, California 94104-3839  
Telephone: (415) 249-8330  
3 Facsimile: (415) 249-8333

4 Attorney for PLANTIFF  
CHANEL, INC., a New York Corporation  
5

6 THE UNITED STATES DISTRICT COURT  
7 FOR THE NORTHERN DISTRICT OF CALIFORNIA

8 CHANEL, INC., a New York  
9 corporation,

10 Plaintiff,

11 v.

12 CASONDRA TSHIMANGA a/k/a  
CASONDRA SMITH a/k/a  
13 CASONDRA SATCHER a/k/a C.  
MAYFIELD a/k/a ANNE LLOYD et al.,

14 Defendants.  
15  
16  
17

Case No. CV 07-03592-EMC

**DECLARATION OF ROBERT  
HOLMES IN SUPPORT OF  
CHANEL, INC.'S MOTION  
FOR ENTRY OF DEFAULT  
JUDGMENT AGAINST  
CASONDRA TSHIMANGA.**

DATE:  
TIME:  
PLACE:

18 I, Robert Holmes, declare and state as follows:  
19

- 20 1. I am an officer of IPCyberCrime.com, LLC, formerly, the Holmes  
21 Detective Agency, a licensed private investigative firm, located in Plano, Texas.  
22 2. I am over 18 years of age and have personal knowledge of the facts set  
23 forth herein.  
24 3. In or about May 2006, IPCyberCrime.com, LLC was retained by  
25 counsel for Chanel, Inc. ("Chanel") to investigate the suspected sale of counterfeit  
26

1 Chanel products by the Defendant Casondra Tshimanga a/k/a Casondra Smith a/k/a  
2 Casondra Satcher a/k/a C. Mayfield a/k/a Anne Lloyd d/b/a HandbagOutpost.com  
3 d/b/a DesignerOutpost.com d/b/a Handbagsluxury.com d/b/a Bay Electronics  
4 (“Tshimanga” or “Defendant”).  
5

6 4. On or about May 3, 2006, I conducted a domain name search of  
7 HandbagOutpost.com and determined the domain name was created on April 10,  
8 2006. Defendant Casondra Tshimanga is listed as the Registrant, the  
9 Administrative Contact, and the Technical Contact. A true and correct copy of the  
10 Whois Record for HandbagOutpost.com is attached hereto as Exhibit “1.”  
11

12 5. On or about May 26, 2006, I accessed the fully interactive Internet  
13 website operating under the domain name HandbagOutpost.com and placed an  
14 order for the purchase of a handbag bearing the Chanel Marks at issue in this action  
15 for \$557.43, including shipping.  
16

17 6. I paid for the handbag by debit/credit card. The payee information  
18 provided by the Defendant was “BAY ELECTRONICS 510-938-8438 CA US.”  
19

20 7. On June 20, 2006, I received the handbag purchased from the  
21 Defendant via UPS. The return address on the outer package was “Handbag  
22 Outpost, (800) 431-1365, Handbag Outpost, 2642 Oliver Dr., Hayward CA 94545.”  
23 A true and correct photograph of the handbag I purchased from the Defendant  
24 through her website HandbagOutpost.com together with true and correct copies of  
25  
26

1 the invoice, the outer package, and the Chain of Custody are attached hereto as  
2 Composite Exhibit "2."

3  
4 8. The handbag I purchased from the Defendant, together with the Chain  
5 of Custody, was sent to Chanel for authentication. Chanel's representative  
6 confirmed the handbag purchased from the Defendant was counterfeit.

7  
8 9. On or about July 2006, my firm received further instructions from  
9 Chanel to investigate the seller for the website DesignerOutpost.net. On July 11,  
10 2006, I conducted a domain name search of DesignerOutpost.net and determined  
11 that the domain name was created on June 1, 2006. Defendant Casondra  
12 Tshimanga is listed as the Registrant, the Administrative Contact, and the Technical  
13 Contact. A true and correct copy of the Whois Record for DesignerOutpost.net is  
14 attached hereto as Exhibit "3."

15  
16  
17 10. In or about January 2007, my firm received further instructions from  
18 Chanel to investigate the seller for the website HandbagsLuxery.com.

19  
20 11. On or about January 9, 2007, I conducted a domain name search of  
21 HandbagsLuxery.com and determined that the domain name was created on  
22 December 10, 2006. A true and correct copy of the Whois Record for  
23 HandsbagsLuxery.com is attached hereto as Exhibit "4."

24  
25 12. On or about January 12, 2007, I accessed the fully interactive Internet  
26 website operating under the domain name HandsBagsLuxery.com and placed an

1 order for the purchase of a handbag bearing the Chanel Marks at issue in this action  
2 for \$599.00, including shipping and fees.

3  
4 13. I paid for the handbag by debit/credit card. The payee information  
5 provided by the Defendant was "IP-SUPREMESALES.COM BASSETERRE 206-  
6 6665600KN."

7  
8 14. Despite numerous attempts to contact the seller, I have not received  
9 my merchandise, a refund, or any information about the status of my order.

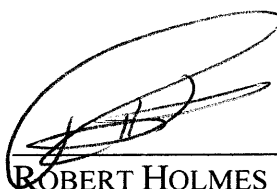
10 15. Through my investigation, I identified Defendant Casondra Tshimanga  
11 a/k/a Casondra Smith a/k/a Casondra Satcher a/k/a C. Mayfield a/k/a Anne Lloyd,  
12 2642 Oliver Drive, Hayward, California 94545 as the individual who owns and  
13 operates the Internet websites HandbagOutpost.com and HandbagsLuxery.com.  
14 During the course of my communication with the Defendant, I received a phone  
15 call from the payee phone number 510-938-8438. The caller identification feature  
16 on my phone listed the caller as "Tshimanga Cason." I was further able to identify  
17 the Defendant by linking the Whois domain registration data for  
18 HandbagOutpost.com and DesignerOutpost.net, which listed the Registrant,  
19 Administrative Contact, and Technical Contact as Casondra Tshimanga. See  
20 Exhibits "1" and "3" attached hereto. Additionally, Defendant lists the same fax  
21 number on both HandbagOutpost.com and HandbagsLuxery.com. See Composite  
22 Exhibit "5" attached hereto.  
23  
24  
25  
26

1           16. Since my firm's retention by Plaintiff on this matter, my firm has  
2 billed Plaintiff, and been paid for, a total of \$ 2,556.43 as fees and buy money to  
3 investigate the Defendant's counterfeiting activities.  
4

5           I declare the foregoing statements to be true and correct under penalty of  
6 perjury under the laws of the United States of America.  
7

8           FURTHER DECLARANT SAYETH NAUGHT.

9           Dated this 14 day of February 2008.

10  
11  
12   
13 ROBERT HOLMES  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

## Exhibit “1”

Login

Your cart is empty

NetworkSolutions



## WHOIS Search Results

**WANT A DOMAIN NAME THAT'S ALREADY REGISTERED?**

Use our Backorder service

to get that name as soon as it expires.

» TRY IT NOW

### SEARCH AGAIN

Enter a search term:

e.g. networksolutions.com

Search by:

- ☒ Domain Name  
☐ NIC Handle  
☐ IP Address

Search »

### WHOIS Record For

**handbagoutpost.com**

Certified Offer Service - Make an offer on this domain  
SSL Certificates - Make this site secure  
Site Confirm Seals - Become a trusted Web Site

#### Registrant:

Tshimanga, Casondra

ATTN: HANDBAGOUTPOST.COM

c/o Network Solutions

P.O. Box 447

Herndon, VA 20172-0447

**Domain Name:** HANDBAGOUTPOST.COM

#### Administrative Contact :

Tshimanga, Casondra

w33qh46y2xj@networksolutionsprivateregistration.com

ATTN: HANDBAGOUTPOST.COM

c/o Network Solutions

P.O. Box 447

Herndon, VA 20172-0447

Phone: 570-708-8780

#### Technical Contact :

Tshimanga, Casondra

w33qh46y2xj@networksolutionsprivateregistration.com

ATTN: HANDBAGOUTPOST.COM

c/o Network Solutions

P.O. Box 447

Herndon, VA 20172-0447

Phone: 570-708-8780

**Record expires on** 10-Apr-2007

**Record created on** 10-Apr-2006



Database last updated on 10-Apr-2006

Domain servers in listed order: Manage DNS

NS27.WORLDDNIC.COM	205.178.190.14
NS28.WORLDDNIC.COM	205.178.189.14

This listing is a Network Solutions Private Registration. Mail correspondence to this address must be sent via USPS Express Mail™ or USPS Certified Mail®; all other mail will not be processed. Be sure to include the registrant's domain name in the address.

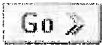
Show underlying registry data for this record

Current Registrar: NETWORK SOLUTIONS, LLC.  
IP Address: 205.178.145.65 (ARIN & RIPE IP search)  
IP Location: US(UNITED STATES)-KANSAS-FT. LEAVENWORTH  
Lock Status: REGISTRAR-LOCK  
DMOZ: no listings  
Y! Directory: see listings  
Web Site Title: Web Page Under Construction  
Data as of: 14-Jun-2005



**Get a Web Site Fast and Easy**

Our hosting packages gets you started with a Web site and a FREE domain.



**Search Through Thousands of Expired Domains**

Don't miss your chance to find a domain name you want. Place a Backorder on an expired domain name today.

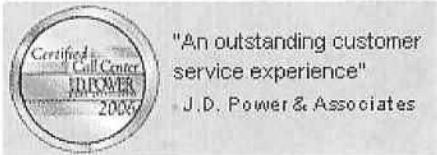


Domain Name Registration | Web Hosting | Web Site Design | SSL Certificates | E-Commerce Solutions | Internet Marketing



Secure Your Site with an SSL Certificate

© Copyright 2006 Network Solutions. All rights reserved.



## Composite Exhibit “2”



handbagoutpost.com

JUN 30 2006

No. 100037

Shipment Tracking

Shipping Via  
UPS Ground

Status  
Shipped

Order Date  
05/26/06

Qty Item No Description

1 chan1 Chanel Cambron Line Bowling Bag, More Colors..  
(white/snake skin)

HANDBAG OUTPOST  
800-431-1365  
HANDBAG OUTPOST  
2642 OLIVER DR  
HAYWARD CA 94545

1 LBS

1 OF 1

DWT: 12,12,8

SHIP TO:



**UPS GROUND**

TRACKING #: 1Z 124 FOV 03 9833 6069



ILLING: P/P



TM

US 6.0 22.0 WAPVUS0 51.0A 01/2006



The **Holmes**  
Detective Agency

## CHAIN OF CUSTODY FORM

### EVIDENCE #20060222

CASE NAME: **handbagoutpost.com**

CASE #: **CH06185**

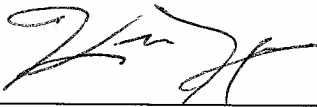

COLLECTED FROM: **Handbag Outpost Inc.**

COLLECTED BY: **MD**

COLLECTION METHOD: **Internet Buy**

DESCRIPTION OF EVIDENCE: **(1) Chanel Cambon Line Bowling Bag (white w/ snakeskin CC's)**

### TRANSFER HISTORY

RECEIVED BY	DATE	SIGNATURE	TRANSFERRED TO	DATE
<b>K. Hedlund</b>	<b>6/20/2006</b>		<b>Oka via UPS</b>	<b>6/22/2006</b>
<i>L. Oka</i>	<i>6/29/06</i>			

## Exhibit “3”

[Login](#)[Your cart is empty](#)**NetworkSolutions.**

## WHOIS Search Results

**Become a trusted site!**Buy an **SSL Certificate** for as low as **\$99** per year[Continue >>](#)**SEARCH AGAIN**

Enter a search term:

  
e.g. networksolutions.com

Search by:

- ☒ Domain Name  
☐ NIC Handle  
☐ IP Address

[Search >>](#)**WHOIS Record For****designeroutpost.net**

Certified Offer Service - Make an offer on this domain  
SSL Certificates - Make this site secure  
Site Confirm Seals - Become a trusted Web Site

**Registrant:**

Tshimanga, Casondra

ATTN: DESIGNEROUTPOST.NET

c/o Network Solutions

P.O. Box 447

Herndon, VA 20172-0447

**Domain Name:** DESIGNEROUTPOST.NET**Administrative Contact :**

Tshimanga, Casondra

c54t65ps2kw@networksolutionsprivateregistration.com

ATTN: DESIGNEROUTPOST.NET

c/o Network Solutions

P.O. Box 447

Herndon, VA 20172-0447

Phone: 570-708-8780

**Technical Contact :**

Tshimanga, Casondra

c54t65ps2kw@networksolutionsprivateregistration.com

ATTN: DESIGNEROUTPOST.NET

c/o Network Solutions

P.O. Box 447

Herndon, VA 20172-0447

Phone: 570-708-8780

**Record expires on** 01-Jun-2016**Record created on** 01-Jun-2006



WHOIS Search provides domain registration information from Network Solutions

Database last updated on 01-Jun-2006

Domain servers in listed order:

Manage DNS

NS45.WORLDDNIC.COM  
NS46.WORLDDNIC.COM

205.178.190.23  
205.178.189.23

This listing is a Network Solutions Private Registration. Mail correspondence to this address must be sent via USPS Express Mail™ or USPS Certified Mail®; all other mail will not be processed. Be sure to include the registrant's domain name in the address.

Show underlying registry data for this record

**Current Registrar:** NETWORK SOLUTIONS, LLC.  
**IP Address:** 205.178.145.65 (ARIN & RIPE IP search)  
**IP Location:** US(UNITED STATES)-KANSAS-FT. LEAVENWORTH  
**Lock Status:** REGISTRAR-LOCK  
**DMOZ** no listings  
**Y! Directory:** see listings  
**Web Site Title:** Handbag store, designer handbags, purses, wallets  
**Meta Description:** Shop our online handbag store, for designer handbags, purses, and wallets.  
**Meta Keywords:** handbag store,designer handbags,purses,wallets,hayward,california,ca,  
**Data as of:** 14-Jun-2005



#### Get a Web Site Fast and Easy

Our Web site packages get you started with a Web site and a FREE domain.

Go ➞



#### Search Through Thousands of Expired Domains

Don't miss your chance to find a domain name you want. Place a Backorder on an expired domain name today.

Go ➞

Domain Name Registration | Web Hosting | Web Site Design | SSL Certificates | E-Commerce Solutions | Internet Marketing



Secure Your Site with an SSL Certificate

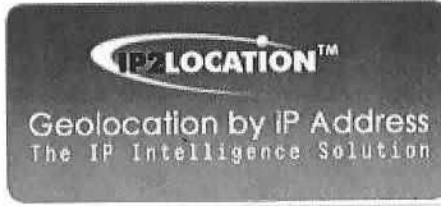
© Copyright 2006 Network Solutions. All rights reserved.

Exhibit “4”

Welcome **shopgrl166** Logout

Whois handbagsluxury.com > Domain Suggestions > For Sale > Auctions > Advanced Auctions > Domain Search > [  
 Domain Directory | Ping > Traceroute > My IP Address | Cheap Domain Name Registration | Bulk Cl  
**Power Tools:** Reverse IP | Domain History | Mark Alert | Name Server Spy new | Advanced Auction

Sponsored Ads



## Whois Record for Handbagsluxery.com

### Front Page Information

**Website Title:** Luxury Handbags, Designer Handbags Year End Closeout Sale

**Record Type:** Domain Name

**Meta Description:** For great designer accessories and christmas gifts try Luxury Handbags

**Meta Keywords:** Women's Accessory, tote bags, shoulder bags, evening bags, prom handbags, wedding handbags, teenage handbags, custom handbags, Designer Handbag, Womens gifts, valentine presents, year end, closeout, handbags, great handbags, coach handbags, gifts, louis vuitton

**AboutUs:** [Wiki article on Handbagsluxery.com](#)

**SEO Score:** 60%

**Meta Relevance:** 40%

**Terms:** 164 (Unique: 102, Linked: 59)

**Images:** 34 (Alt tags missing: 6)

**Links:** 26 (Internal: 25, Outbound: 1)

### Add Missing Thumb

[Add Thumbnail](#) (usually)

### SEO Text Browser

SEO Text

Luxury Handbags

MFG **Welcome to Inc**  
 Category **Enjoy our la**  
 Handbags **designer har**  
 Shoulder **and save hu**  
 Bags **Free Shippin**  
 Tote Bottega Vene  
 Bags Roma Woven  
 Leather Bag  
 List  
 Price Price \$2,650.1  
 \$100 - Your

<http://www.handba>

### Indexed Data

**Alexa Trend/Rank:** 1,232,372 (1 Month) 2,580,053 (3 Month)

### Server Data

**Server Type:** WebServer 3-9

**IP Address:** 205.178.164.8

**IP Location:** - Inquent Technologies Inc

**Response Code:** 200

**Blacklist Status:** Clear

**SSL Cert:** [\\*.netsolstores.com](#) expires in 782 days

**Website Status:** Active

[Disable SEO Text E](#)

### Other TLDs

.com .net .org

### Backorder

[Set a backorder](#) so you handbagsluxery.com wr

## Registry Data

**ICANN Registrar:** NETWORK SOLUTIONS, LLC.

**Created:** 2006-12-10

**Expires:** 2007-12-10

**Registrar Status:** clientTransferProhib

**Whois Server:** whois.networksolutions.com

**Name Server:** NS97.WORLDDNIC.COM



Your e-mail can be read by anyone – secure it today!



NetworkSolutions.

available.

## Domains for Sale

### Domain

[YesMy.com](#)

[Yielded.com](#)

[Yetty.com](#)

[YourKey.com](#)

[YoVit.com](#)

[YamOz.com](#)

[YourLand.com](#)

[YoungStyle.com](#)

[YoungsIn.com](#)

[YSale.com](#)

[Yavapai.com](#)

## Whois Record

Registrant:

Watson, Kelly

ATTN: HANDBAGSLUXERY.COM

c/o Network Solutions

P.O. Box 447

Herndon, VA. 20172-0447

Domain Name: HANDBAGSLUXERY.COM

Administrative Contact, Technical Contact:

Watson, Kelly

nt2sh2n9738@networksolutionsprivateregistration.com

ATTN: HANDBAGSLUXERY.COM

c/o Network Solutions

P.O. Box 447

Herndon, VA 20172-0447

570-708-8780

Record expires on 10-Dec-2007.

Record created on 10-Dec-2006.

Domain servers in listed order:

NS97.WORLDDNIC.COM 205.178.190.49

NS98.WORLDDNIC.COM 205.178.189.49



Members Area | Hosting Metrics | Stock Ticker | Download | Domain Registration | Whois | Domain Suggestion

## Composite Exhibit “5”

# HANDBAG OUTPOST INC.

## MORE INFORMATION

Policy  
Our Affiliates

## SEARCH

GO

Advanced Search

## PRODUCTS

Briefcases  
Closeout  
Handbags  
Jewelry  
Luggage  
Pouches  
Shoulder Bags  
Tote Bags  
Wallets  
Spring/Summer 2007

## BRANDS

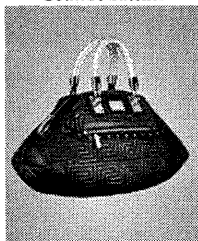
--Select--

## PRICE RANGE

\$0 - 100  
\$100 - 200  
\$200 - 300  
\$300 - 400  
\$400 - 500  
\$500 - 600  
\$600 - 700  
\$700 - 800  
\$800 - 900  
\$900 - 1000  
\$1000 - 1500  
\$1500 - 2000  
\$2000 - 5000  
\$5000 - 10000  
\$10000 - 50000

### March's Featured Handbag

Enjoy This Stunning Versace Quilted  
Couture Satchel



\$1,299.00

Info@handbagoutpost.com  
sales@handbagoutpost.com

Mailing Address:  
Handbag Outpost Inc.  
39270 Paseo Padre Parkway #325  
Fremont, CA 94536

Phone: 800-431-1365  
Fax: 408-834-7414



## SHOPPING CART

Your Cart Is Empty

## JOIN NEWSLETTER

Enter Email Here!

GO

## Top Sellers

1. Marc Jacobs  
Quilted Stam  
Bag, Two  
Colors
2. Dior Gaucho  
Medium  
Saddle Bag,  
Six Colors
3. Christian Dior  
Rebel Leather  
& Suede  
Shopper
4. Coach Flap  
Patchwork  
Satchel
5. Coach  
Signature  
Stripe  
Shearling  
Tote
6. Louis Vuitton  
Speedy 30
7. Coach  
Patchwork  
Tote
8. Louis Vuitton  
Batignolles  
Horizontal
9. Dior  
Diorissimo  
Multi-Pocket  
Hobo, Two  
Colors
10. Lady Dior  
Cannage  
Bag, Two  
Colors

Copyright 2006 - 2007 Handbag Outpost Inc... ALL RIGHTS RESERVED.

[home](#) | [company info](#) | [contact us](#) | [customer login](#) | [view cart](#)



Luxury Handbags



[HOME](#)

[STORE](#)

[ABOUT US](#)

[CONTACT US](#)

manufacturer

--Select--

[info@handbagsluxury.com](mailto:info@handbagsluxury.com)

[orders@handbagsluxury.com](mailto:orders@handbagsluxury.com)

Customer Service (866) 259-7773

Phone Orders (866) 259-7773

Fax (408) 834-7414

[shopping cart](#)

**Your Cart Is Empty**

[mailing list](#)

Enter Email Here!

[GO](#)

**LIVE  
HELP  
OFFLINE**

category

[Handbags](#)

[Shoulder Bags](#)

[Tote Bags](#)

search by price

[\\$100 - 200](#)

[\\$200 - 300](#)

[\\$300 - 400](#)

[\\$400 - 500](#)

[\\$500 - 600](#)

[\\$600 - 700](#)

[\\$700 - 800](#)

[\\$800 - 900](#)

[\\$900 - 1000](#)

[\\$1000 - 1500](#)

[\\$1500 - 2000](#)

[\\$2000 - 5000](#)

[\\$5000 - 10000](#)

[\\$10000 - 20000](#)

[more information](#)

[Policy](#)